

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re Joanne M. Trujillo

Debtor(s)

Case No. 23-12076  
Chapter 13

**DEBTOR'S RESPONSE AND OPPOSITION TO MOTION FOR RELIEF OF THE AUTOMATIC STAY OF SN  
SERVICING CORPORATION AS SERVICER FOR U.S. BANK TRUST NATIONAL**

Debtor, Joanne Trujillo, by and through her attorney, Tova Weiss, does hereby respond to and oppose the Motion for Relief of the Automatic and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Denied. Debtor is without knowledge as to the exact amount owing on her mortgage and therefore this averment is denied.
14. Denied. This averment is a conclusion of law to which no responsive pleading is required.
15. Denied. This averment is a conclusion of law to which no responsive pleading is required.
16. Denied. Debtor filed this instant Bankruptcy in good faith, she has a full-time job as a nurse and therefore the Automatic Stay should not be terminated.
17. Denied. Debtor filed this instant Bankruptcy in good faith, she has a full-time job as a nurse and therefore the Automatic Stay should not be terminated. Debtor did not intend to delay, hinder or defraud the mortgage company.
18. Denied. Movant will not be irreparably harmed by debtor's instant case.
19. Denied. This averment is a conclusion of law to which no responsive pleading is required.

WHEREFORE, Debtor respectfully requests that this Honorable Court Deny the Motion for Relief filed by SN Servicing Company.

Respectfully submitted,  
/s/Tova Weiss  
Tova Weiss, Esquire  
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